

REMARKS

Applicants respectfully traverse and request reconsideration.

Claims 10, 14, 19, 22, 26, 42, 50, 52 and 62 are withdrawn from consideration.

Applicants' attorney wishes to thank Examiner Chu for the courtesies extended during the telephone conference of September 27, 2005. As discussed, the Applicants' attorney noted that the words "packaged semiconductor die" and "unpackaged semiconductor die", for example, in claim 56 have meaning to one of ordinary skill in the art as evidenced by some of the cited references and Applicants' specification and that the claims as previously presented were not anticipated by the Lu reference for the reasons stated in the previous response. The Examiner agreed that if the term "packaged semiconductor die" referred to a separately packaged semiconductor die as shown in Applicants' specification and other cited references then the claims would not be anticipated by the Lu reference. In an effort to expedite prosecution, Applicants have amended the independent claims to include language inherent in the previously presented claims indicating that the packaged semiconductor die and packaged memory die as known in the art, are individually packaged semiconductor dies or individually packaged memory dies meaning they are separately packaged dies from the package module.

As such, claims 2, 5, 6, 8, 9, 12, 13, 41, 44-48, 56 and 58-61 which stand rejected under 35 U.S.C. §102(e) as being anticipated by Lu are not anticipated at least since Lu shows the top surface of the packaged semiconductor die well below the top surface of the encapsulated structure that encapsulates any unpackaged semiconductor die and actually requires the use of a thermal conductive shim 120 on top of the packaged die.

The dependent claims are all likewise allowable and in addition, the dependent claims add additional novel and non-obvious subject matter.

Claims 3, 4, 7, 17, 18, 20, 24, 25, 53, 54 and 57 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Lu in view of Hannah. Applicants respectfully submit that the dependent claims add additional novel and non-obvious subject matter and are also allowable over Lu for the reasons given above. Accordingly, these claims are also in condition for allowance.

Claim 11 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Lu in view of Takano et al. Applicants respectfully submit that the claim is in condition for allowance at least for depending upon an allowable base claim.

Claim 23 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Lu and Hannah as applied to claim 57 and further in view of Takano. Applicants respectfully reassert the relevant remarks made above and as such, this claim is also in condition for allowance.

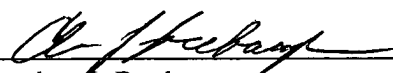
New claims 63-67 are also believed to be allowable for at least depending on an allowable base claim.

Applicants respectfully submit that the claims are in condition for allowance, and an early Notice of Allowance is earnestly solicited. The Examiner is invited to telephone the below-listed attorney if the Examiner believes that a telephone conference will expedite the prosecution of the application.

Dated: 12/27/05

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Respectfully submitted,



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